

**LOCAL BANKRUPTCY FORM 5071-1
IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:

RONALD DALLEY
F/D/B/A X ALPINE CONTRACTING
Debtor

FIFTH THIRD BANK
Movant

v.

RONALD DALLEY
F/D/B/A X ALPINE CONTRACTING
Respondent

: **BK. No. 5:15-05200 JJT**
:
: **Chapter No. 13**
:
: **11 U.S.C. §362**
:
: **Name of Proceeding: MOTION FOR**
: **RELIEF FROM THE AUTOMATIC**
: **STAY**
:
Document # 61

REQUEST TO CONTINUE HEARING/TRIAL WITH CONCURRENCE

This request must be filed at least twenty-four (24) hours prior to the hearing. All requests must be approved by the Court. Submitting a request is not an automatic continuance.

The undersigned hereby requests a continuance with the concurrence of the opposing party (parties). This is a first request for a continuance.

Reason for the continuance:

Parties are trying to resolve the matter and request to continue to November 1, 2016

Contemporaneous with the filing of this request, the undersigned has served a copy of this request upon all counsel participating in this proceeding.

Dated:
September 19, 2016

/s/ Joseph P. Schalk, Esquire
Joseph P. Schalk, Esq., Id. No.91656
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CERTIFICATION OF SERVICE

TO THE BANKRUPTCY COURT CLERK:

Service upon the following persons was made by sending a true and correct copy of the Request to

Continue Hearing/Trial with Concurrence by first class mail or electronic means on the date listed below.

CHARLES J. DEHART, III, ESQUIRE
(TRUSTEE)
8125 ADAMS DRIVE, SUITE A
HUMMELSTOWN, PA 17036

RONALD DALLEY
46 MUSKEGON CIRCLE
HAZLETON, PA 18202

TULLIO DELUCA,, ESQUIRE
381 NORTH 9TH STREET
SCRANTON, PA 18504

UNITED STATES TRUSTEE
228 WALNUT STREET, SUITE 1190
HARRISBURG, PA 17101

DATE: September 19, 2016

/s/ Joseph P. Schalk, Esquire
Joseph P. Schalk, Esq., Id. No.91656
Phelan Hallinan Diamond & Jones, LLP
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